

[Submitting Counsel below]

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

Case No. 23-md-03084-CRB

This Document Relates to:

ALL CASES

**ADMINISTRATIVE MOTION TO
CONSIDER WHETHER ANOTHER
PARTY'S MATERIAL SHOULD BE
FILED UNDER SEAL**

Under Civil Local Rules 7-11 and 79-5(f), Plaintiffs move the Court to consider whether material designated confidential by Uber should be sealed.

On September 8, 2025, the parties filed a joint letter which refers to and attaches documents that Uber designated "HIGHLY CONFIDENTIAL" and "CONFIDENTIAL."

Material To Be Filed Under Seal

The material to be filed under seal is in a portion of Plaintiffs' motion, portions of the declaration in support, and the attached exhibits:

Document	Description	Designating Party
[Unredacted] Joint Letter Regarding 30(b)(6) Topics and Written Discovery	Portion of briefing referring to documents and testimony designated highly confidential and confidential	Uber
Exhibit A	Excerpts of Uber Defendants' August 18, 2025 Objections and Responses to Plaintiffs' Interrogatories and Requests for Admission in Lieu of 30(b)(6) depositions designated as highly confidential	Uber
Exhibit B	Excerpts of the August 21, 2025 deposition transcript of Chad Dobbs designated as highly confidential	Uber

Document	Description	Designating Party
Exhibit C	Uber-produced document bates stamped UBER_JCCP_MDL_003341903 and Exhibit 1897 designated as highly confidential	Uber
Exhibit D	Uber-produced document bates stamped UBER_JCCP_MDL_0003276626 designated as confidential	Uber
Exhibit E	Uber-produced document bates stamped UBER_JCCP_MDL_002618039 designated as confidential	Uber

Under Local Rule 79-5(f)(3), Uber bears the responsibility to establish that all of the designated material is sealable.

This motion complies with Civil Local Rule 7-11 and 79-5, and the following attachments accompany this motion:

1. The Declaration of Maya R. Kalonia in Support of this Motion; and
2. A Proposed Order that lists in tabular format all material sought to be sealed.

Dated: September 8, 2025

Respectfully submitted,

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Co-Lead Counsel for Plaintiffs

FILER'S ATTESTATION

I am the ECF User whose ID and password are being used to file this document. In compliance with Civil Local Rule 5-1(i)(3), I attest that the signatories above concurred in this filing.

Dated: September 8, 2025

By: /s/ Maya R. Kalonia
Maya R. Kalonia